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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

**IN RE STATIC RANDOM ACCESS
MEMORY (SRAM) ANTITRUST
LITIGATION**

Case No. M:07-CV-01819-CW

MDL No. 1819

**STIPULATION & ORDER
EXTENDING TIME TO OBJECT
AND SEEK MODIFICATION OF
MAY 20, 2008 DISCOVERY ORDER
REGARDING TRANSACTIONAL
DATA**

[Civ. L.R. 6-2]

This Document Relates To:
ALL ACTIONS

1 WHEREAS, on May 20, 2008, the Discovery Master, Judge (Ret.) Fern M. Smith, issued
2 the SRAM Discovery Order Regarding Transactional Data (Docket No. 442; referred to herein as
3 “Transactional Data Discovery Order”);

4 WHEREAS, pursuant to Federal Rule of Civil Procedure 72, and the terms of the
5 September 26, 2007 Stipulation and Order Appointing Discovery Master (Docket No. 302), **the**
6 **deadline for a party to object and/or seek modification of the Transactional Data Discovery**
7 **Order is June 4, 2008;**

8 WHEREAS, the Direct Purchaser Plaintiff and the Indirect Purchaser Plaintiffs
9 (collectively, “Plaintiffs”) have informed Defendants that they wish to modify paragraph III on
10 page 2 of the Transactional Data Discovery Order (which currently reads: “Plaintiffs are premature
11 in seeking discovery of PSRAM data, absent a finding that PSRAM does in fact qualify as SRAM,
12 rather than DRAM.”);

13 WHEREAS, the Plaintiffs and Defendants (collectively “Parties”) are currently seeking and
14 hope to reach agreement on such a modification;

15 WHEREAS, no prior time modifications relating to the Transactional Data Discovery Order
16 have previously been sought or granted;

17 WHEREAS, the below-requested two-day time extension will have virtually no impact on
18 the case schedule;

19 **THE PARTIES HEREBY STIPULATE AND AGREE, PURSUANT TO CIVIL**
20 **LOCAL RULE 6-2, AS FOLLOWS:**

21 **The deadline for any party to object and/or seek modification of paragraph III on**
22 **page 2 of the Transactional Data Discovery Order shall be extended by two days to June 6,**
23 **2008.**

24 Dated: June 4, 2008

COTCHETT, PITRE & McCARTHY

25 By: /s/ Neil Swartzberg
26 Neil Swartzberg
27 *Interim Lead Counsel for Direct*
28 *Purchaser Class*

1 Dated: June 4, 2008

ZELLE, HOFMAN, VOLBEL, MASON &
GETTE LLP

2
3 By: /s/ Craig C. Corbitt
Craig C. Corbitt
4 *Interim Lead Counsel for Indirect*
Purchaser Class


5 Dated: June 4, 2008

LATHAM AND WATKINS LLP

6
7 By: /s/ Belinda S. Lee
Belinda S. Lee
8 *Acting Liaison Counsel for Defendants*
on this Matter

9
10 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

11
12 Dated: June 4, 2008



Hon. Claudia Wilken
United States District Judge
Northern District of California

13
14
15 **ATTESTATION OF FILING**

16 Pursuant to N.D. Cal. General Order No. 45, section 45 X(B), I, Neil Swartzberg, hereby
17 attest that concurrence in the filing of this stipulation and proposed order has been obtained from:
18 Lead Counsel for the Indirect-Purchaser Plaintiffs and the Proposed Class, and Acting Liaison
19 Counsel for Defendants on this Matter who have provided the conformed signatures above.

20
21 **COTCHETT, PITRE & MCCARTHY**

22 By: /s/ Neil Swartzberg
Neil Swartzberg

23 **SUBMITTED BY:**
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